

Exhibit D

James Judah

From: Jocelyn Ma
Sent: Friday, May 5, 2023 9:03 PM
To: Moulton, Libby; James Judah
Cc: Sonos-NDCA06754-service; LS3_team@ls3ip.com; QE-Sonos3
Subject: RE: Sonos v. Google, No. 3:21-cv-6754-WHA | Timeline for Trial

Thank you Libby. We have sent this to the vendor for printing.

Jocelyn

From: Moulton, Libby <emoulton@orrick.com>
Sent: Friday, May 5, 2023 8:43 PM
To: James Judah <jamesjudah@quinnemanuel.com>
Cc: Jocelyn Ma <jocelynma@quinnemanuel.com>; Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>; LS3_team@ls3ip.com; QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: Re: Sonos v. Google, No. 3:21-cv-6754-WHA | Timeline for Trial

James, the timeline is good.

Libby Moulton
612-720-9187

On May 5, 2023, at 7:09 PM, James Judah <jamesjudah@quinnemanuel.com> wrote:

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Libby –

Attached and below is the proposed timeline. Please confirm this is acceptable. If so we'll send to the printer to create the posterboard. Also, we assume that Sonos agrees to split the invoice.

<image001.png>

Best,
James

From: Moulton, Libby <emoulton@orrick.com>
Sent: Friday, May 5, 2023 5:46 PM
To: James Judah <jamesjudah@quinnemanuel.com>; Jocelyn Ma <jocelynma@quinnemanuel.com>; Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>; LS3_team@ls3ip.com
Cc: QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: RE: Sonos v. Google, No. 3:21-cv-6754-WHA | Timeline for Trial

[EXTERNAL EMAIL from emoulton@orrick.com]

James, we agree.

Libby Moulton
Cell: 612-720-9187

From: James Judah <jamesjudah@quinnemanuel.com>
Sent: Friday, May 5, 2023 5:25 PM
To: Moulton, Libby <emoulton@orrick.com>; Jocelyn Ma <jocelynma@quinnemanuel.com>; Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>; LS3_team@ls3ip.com
Cc: QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: RE: Sonos v. Google, No. 3:21-cv-6754-WHA | Timeline for Trial

Libby –

If Sonos doesn't agree to include the undisputed date when Sonos implemented the claimed feature in its products, then we don't agree to include the date when Google implemented the accused feature in its products. Below is our compromise proposal. Please confirm whether we have agreement.

1. **January 2005:** Sonos released Sonos 2005 System
2. **September 12, 2006:** '885 & '966 Patents – Provisional application filed
3. **November 5, 2019:** '966 Patent issued
4. **September 28, 2020:** This lawsuit filed
5. **November 24, 2020:** '885 Patent issued

Best,
James

From: Moulton, Libby <emoulton@orrick.com>
Sent: Friday, May 5, 2023 4:33 PM
To: James Judah <jamesjudah@quinnemanuel.com>; Jocelyn Ma <jocelynma@quinnemanuel.com>; Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>; LS3_team@ls3ip.com
Cc: QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: RE: Sonos v. Google, No. 3:21-cv-6754-WHA | Timeline for Trial

[EXTERNAL EMAIL from emoulton@orrick.com]

James, let's try one more time. Judge Alsup was clear that he wanted us to agree and would only publish a stipulated timeline. We are trying to narrow the disputes. Please work with us.

6. **January 2005:** Sonos releases Sonos 2005 System
7. **September 12, 2006:** '885 & '966 Patents – Provisional application filed
8. **December 2015:** Google releases accused product
9. **November 5, 2019:** '966 Patent issued
10. **September 28, 2020:** This lawsuit filed
11. **November 24, 2020:** '885 Patent issued

Libby Moulton
Cell: 612-720-9187

From: James Judah <jamesjudah@quinnemanuel.com>
Sent: Friday, May 5, 2023 4:10 PM
To: Moulton, Libby <emoulton@orrick.com>; Jocelyn Ma <jocelynma@quinnemanuel.com>; Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>; LS3_team@ls3ip.com
Cc: QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: RE: Sonos v. Google, No. 3:21-cv-6754-WHA | Timeline for Trial

Libby –

Below is our final proposed compromise. Unlike Sonos' self-serving proposal, the dates in our proposal are undisputed, accurate, and non-argumentative. If Sonos will not agree this version, then unfortunately we have a dispute that Judge Alsup will need to decide. We propose that each side submit its proposed timeline in a joint filing by 7 PM tonight with a single paragraph from each side explaining its position. Please let us know by 4:45 PM whether we have a dispute and if so what Sonos' final proposal is that will be submitted in the joint filing.

12. **January 2005:** Sonos releases Sonos 2005 System
13. **December 21, 2005:** '885 & '966 Patents – Alleged Conception Date
14. **September 12, 2006:** '885 & '966 Patents – Provisional application filed
15. **December 2015:** Google releases accused functionality
16. **April 12, 2019:** '885 & '966 Patents filed
17. **November 5, 2019:** '966 Patent issued
18. **June 8, 2020:** Sonos first releases feature practicing '885 & '966 Patents
19. **September 28, 2020:** This lawsuit filed
20. **November 24, 2020:** '885 Patent issued

Best,
James

From: Moulton, Libby <emoulton@orrick.com>
Sent: Friday, May 5, 2023 10:55 AM
To: Jocelyn Ma <jocelynma@quinnemanuel.com>; Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>; LS3_team@ls3ip.com
Cc: QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: RE: Sonos v. Google, No. 3:21-cv-6754-WHA | Timeline for Trial

[EXTERNAL EMAIL from emoulton@orrick.com]

Sorry one edit below:

21. **January 2005:** Sonos releases first product
22. **September 12, 2006:** '885 & '966 Patents – Effective Filing Date
23. **December 2015:** Google releases first accused product
24. **November 5, 2019:** '966 Patent issued
25. **September 28, 2020:** This lawsuit filed
26. **November 24, 2020:** '885 Patent issued

Libby Moulton
Cell: 612-720-9187

From: Moulton, Libby <emoulton@orrick.com>
Sent: Friday, May 5, 2023 10:53 AM
To: Jocelyn Ma <jocelynma@quinnemanuel.com>; Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>; LS3_team@ls3ip.com
Cc: QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: RE: Sonos v. Google, No. 3:21-cv-6754-WHA | Timeline for Trial

Jocelyn, please see below revisions to the timeline:

- 27. **January 2005:** Sonos releases first product
- 28. **September 12, 2006:** '885 & '966 Patents – Effective Filing Date
- 29. **December 2015:** Google releases accused functionality
- 30. **November 5, 2019:** '966 Patent issued
- 31. **September 28, 2020:** This lawsuit filed
- 32. **November 24, 2020:** '885 Patent issued

Libby Moulton
Cell: 612-720-9187

From: Jocelyn Ma <jocelynma@quinnemanuel.com>
Sent: Thursday, May 4, 2023 10:57 PM
To: Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>; LS3_team@ls3ip.com
Cc: QE-Sonos3 <qe-sonos3@quinnemanuel.com>
Subject: RE: Sonos v. Google, No. 3:21-cv-6754-WHA | Timeline for Trial

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Counsel,

In light of the Court's directive regarding a timeline and our meet and confer earlier this week, we propose the following revised dates:

- 33. **December 21, 2005:** '885 & '966 Patents – Alleged Conception Date
- 34. **September 12, 2006:** '885 & '966 Patents – Provisional application filed
- 35. **December 2015:** Google releases accused functionality
- 36. **April 12, 2019:** '885 & '966 Patents filed
- 37. **November 5, 2019:** '966 Patent issued
- 38. **June 8, 2020:** Sonos first releases feature practicing '885 & '966 Patents
- 39. **November 24, 2020:** '885 Patent issued

Please let us know by tomorrow at 4 p.m. whether you agree as a 4x8 feet poster (the size suggested by Judge Alsup's standing order) requires at least 48 hours to print.

Best,
Jocelyn

From: Jocelyn Ma
Sent: Monday, May 1, 2023 11:17 AM
To: Sonos-NDCA06754-service <Sonos-NDCA06754-service@orrick.com>; LS3 Team <LS3_team@ls3ip.com>

Cc: QE-Sonos3 <qe-sonos3@quinnemanuel.com>

Subject: Sonos v. Google, No. 3:21-cv-6754-WHA | Timeline for Trial

Counsel,

Per paragraph 32 of Judge Alsup's standing order, "counsel should agree on a non-argumentative posterboard timeline to be ever-present in the courtroom for ready reference by the jury as the evidence comes in" that "will provide an undisputed fixed frame of reference about which the jury can organize the disputed issues." The standing order also directs counsel to "stipulate to the maximum feasible extent as to all facts that in good faith cannot be disputed, so that the jury can concentrate on assessing the issues in play."

We propose that the following dates be included on the timeline:

40. **September 9, 2002:** U.S. Patent No. 7,197,148 ("Nourse") filed
41. **2003:** Bose Lifestyle 50 System
42. **2004:** Yamaha DME System
43. **January 2005:** Sonos Digital Music System
44. **September 2005:** Sonos Forums
45. **November 2005:** Squeezebox System
46. **May 6, 2006:** Bose FreeSpace System
47. **December 21, 2005:** '885 & '966 Patents – Alleged Conception Date
48. **December 2015:** Google releases accused functionality
49. **April 12, 2019:** '885 & '966 Patents filed
50. **November 5, 2019:** '966 Patent issued
51. **June 8, 2020:** Sonos alleged practice of '885 & '966 Patents
52. **November 24, 2020:** '885 Patent issued

Given that trial begins in a week, please let us know if you agree or provide your counterproposal by May 3. We are also available to meet and confer if that would be helpful.

Best,
Jocelyn

Jocelyn Ma
Associate,
Quinn Emanuel Urquhart & Sullivan, LLP

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San Francisco, CA 94111
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